

# Exhibit D

March 07, 2019

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IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
San Francisco Division

IN RE: )  
)  
CATHODE RAY TUBE (CRT) ) Master File No.  
ANTITRUST LITIGATION ) 07-CV-5944-JST  
)  
) MDL No. 1917  
)  
)  
)  
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DEPOSITION OF WANG ZHAOJIE

HIGHLY CONFIDENTIAL

VOLUME II

Thursday, March 7th, 2019

AT: 9.02 am

Taken at:

Kobre & Kim  
6/F ICBC Tower  
3 Garden Road  
Central  
Hong Kong

Court Reporter:

Bron Williams  
Accredited Real-time Reporter

March 07, 2019

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## A P P E A R A N C E S

Appearing for the Direct Plaintiffs:

STEVEN BENZ  
BENJAMIN MARGO  
KELLOGG, HANSEN, TODD, FIGEL & FREDERICK  
Sumner Square  
1615 M Street, NW, Suite 400  
Washington, DC 20046  
Telephone: 202.326.7929

DAVID HWU  
SAVERI & SAVERI  
706 Sansome Street  
San Francisco, CA 94111  
Telephone: 415.217.6810

Appearing for the Indirect Plaintiffs:

MS QIANWEI FU  
ZELLE LLP  
44 Montgomery Street  
Suite 3400  
San Francisco CA 94104  
Telephone: 415.633.1906

MS LAUREN CAPURRO  
TRUMP, ALIOTO, TRUMP AND PRESCOTT  
2280 Union Street  
San Francisco  
CA 94123  
Telephone: 415.563.7200

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Appearing for the Defendant:

STUART PLUNKETT  
BRIAN JACOBMEYER  
KAYLEE YANG  
YAN ZHANG  
BAKER BOTTS LLP  
101 California Street  
Suite 3600  
San Francisco, CA 94111  
Telephone: 415.291.6203

Also present: Inga Kornev

Videographer

Ms Shing Tang (Irico rep)

Ms Guo Xiao Yan (Irico rep)

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## W I T N E S S     I N D E X

Witness

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1 VIDEOGRAPHER: Good morning. Here begins  
2 volume II, media number 1 in the deposition of Wang Zhaojie,  
3 in the matter of In Re Cathode Ray Tube (CRT) Antitrust  
4 Litigation in the United States District Court, Northern  
5 District of California, San Francisco Division, Master File  
6 Number 07-CV-5944-JST MDL number 1917.

7 Today's date is March 7, 2019. The time on the  
8 video monitor is 9.02 a.m. The certified video operator  
9 today is Inga Kornev contracted by US Legal Support. This  
10 video deposition is taking place at Kobre & Kim, ICBC Tower,  
11 3 Garden Road, Central, Hong Kong. Counsel please voice  
12 identify yourselves and state whom you represent.

13 MR. BENZ: Steven Benz from the law firm of  
14 Kellogg, Hansen PLLC in Washington DC for the direct  
15 purchaser plaintiffs.

16 MR. MARGO: Benjamin Margo from the Kellogg,  
17 Hansen law firm for the direct purchaser plaintiffs.

18 MS. FU: Qianwei Fu from Zelle LLP in San  
19 Francisco for the indirect purchaser plaintiffs.

20 MS. CAPURRO: Lauren Capurro, Trump, Alioto, Trump  
21 & Prescott for the indirect purchaser plaintiffs.

22 MR. HWU: David Hwu from Saveri & Saveri in San  
23 Francisco on behalf of the direct purchaser plaintiffs.

24 MR. PLUNKETT: Stuart Plunkett of Baker Botts on  
25 behalf of the Irico defendants and the witness.

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1 MS. YANG: Kaylee Yang from Baker Botts LLP on  
2 behalf of the defendant, Irico defendant.

3 MR. JACOBSMEYER: Brian Jacobsmeyer from Baker  
4 Botts LLP on behalf of the Irico defendants and the witness.

5 MS. SHANG: Shang Ting.

6 MS. GUO: Xiaoyan Guo.

7 INTERPRETER: Kuang-Shai Chao. I am the  
8 interpreter.

9 VIDEOGRAPHER: The court reporter today is Bron  
10 Williams, on behalf of US Legal Support.

11 Would the reporter please swear in the  
12 interpreters and the witness.

13 INTERPRETER - Mr Kuang-Shai Chao (sworn)

14 MS QIANWEI FU - (affirmed) - acting as check interpreter

15 WANG ZHAOJIE

16 having been duly affirmed testified as follows:

17 (All answers were given through the interpreter unless  
18 otherwise indicated)

19 BY MR. BENZ:

20 Q. Good morning, Mr. Wang.

21 A. Good morning.

22 Q. If you could pick up Exhibit 8390, the  
23 30(b)(6) deposition notice.

24 (Previously marked exhibit 8390 shown to the witness)

25 A. Yes.



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1 A. About a couple of weeks ago.

2 Q. Did you speak with Mr. Guo to prepare for your  
3 testimony here today? At any time?

4 MR. PLUNKETT: Object to the form.

5 BY MR. BENZ:

6 Q. Mr. Wang, there is a question pending, unless  
7 your counsel --

8 A. First of all, I worked for this company for  
9 many, many years, and in the sales department, where Mr. Guo  
10 was my supervisor. I also reviewed his declaration.

11 BY MR. BENZ:

12 Q. You did not answer my question, Mr. Wang. My  
13 question was: Did you speak with Mr. Guo to prepare for  
14 your deposition here today?

15 MR. PLUNKETT: Object to the form.

16 A. Would you please repeat your question?

17 BY MR. BENZ:

18 Q. Did you speak with Mr. Guo to prepare for your  
19 deposition?

20 MR. PLUNKETT: Object to the form.

21 MR. BENZ: What is the basis for your objection?  
22 It is a simple fact.

23 MR. PLUNKETT: No. The basis for the objection is  
24 the confusion you have confusion in asking him whether he  
25 spoke to Mr. Guo -- you know, a few days to prepare for

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1 MR. PLUNKETT: Object to the form.

2 A. I'm not very clear about your questions. As  
3 I said, Mr. Guo was my supervisor long time ago. We have  
4 regular contact and communication. In the past.

5 BY MR. BENZ:

6 Q. In the past month have you spoken with  
7 Mr. Guo?

8 A. Please be more specific.

9 Q. In the past 30 days have you spoken with  
10 Mr. Guo?

11 A. Please be specific about the date.

12 MR. PLUNKETT: So I would like to advise the  
13 witness that to the extent he is able to understand that  
14 counsel is asking him if in the past 30 days he has ever  
15 spoken to Mr. Guo for any reason, he should provide that  
16 information to counsel.

17 A. I don't remember exactly.

18 MS. FU: I would like to correct that translation.  
19 It should be "I don't recall." (Chinese spoken). It is not  
20 (Chinese spoken). (Chinese spoken).

21 A. (Chinese spoken).

22 INTERPRETER: The witness said "I don't agree."

23 To clarify, I agree with the check interpreter's  
24 comment.

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1 INTERPRETER: (Chinese spoken).

2 A. I have reviewed 50 documents. And the  
3 relevant informations.

4 (Exhibit 8414 marked for identification)

5 Q. Mr. Wang, I've handed you what has been marked  
6 as Exhibit 8414.

7 A. Okay.

8 Q. I will represent to you that it is from  
9 a Chinese government website. The exhibit has the official  
10 English version on top, and the official Chinese version  
11 underneath.

12 Please take a moment to familiarize yourself with  
13 this document.

14 A. Okay. It will take a while.

15 BY MR. BENZ:

16 Q. Mr. Guo(sic), it has been 13 minutes. You can  
17 have as much time as you want to review the document, but  
18 I only have a few questions about the document.

19 Sorry: Mr. Wang.

20 A. Just take a while, I'm about to finish it.

21 Q. That's fine. Thank you.

22 A. Okay, I'm done.

23 Q. Mr. Wang, do you know what this document is?

24 A. This is a company law of the People's Republic  
25 of China.

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1 During that time were you a member of the Chinese Communist  
2 Party?

3 A. Yes.

4 Q. When you were at Group, your supervisor was  
5 Mr. Guo, correct?

6 Was Mr. Guo a member of the Chinese Communist  
7 Party?

8 MR. JACOBSMEYER: Object to the form.

9 A. Your question is not very precise, because the  
10 fact is that I worked for Irico for many, many years, so  
11 there is Mr. Guo who worked for many, many years. There are  
12 quite a lot of change in between. So I'm not quite when you  
13 refer to supervisor, I'm not quite sure regarding that  
14 point.

15 BY MR. BENZ:

16 Q. I'm talking about Mr. Guo who authored the  
17 declaration that you reviewed.

18 Was Mr. Guo a member of the Chinese Communist  
19 Party when he was your supervisor?

20 A. I don't know.

21 However, there is a requirement, for people who  
22 serve as a senior manager in Irico Group, this person  
23 supposed to be a member of Chinese Communist Party member.

24 Okay. The reason I say your question is very  
25 vague, is the fact that Mr. Guo joined Irico many, many

1 years ago, and even earlier than me. He started from  
2 a technician at the factory, and become a deputy manager at  
3 the glass factory, and then later on he was promoted to the  
4 senior management. As a state-owned corporation, all the  
5 senior managers supposed to be the member of the communist  
6 party. This is an amendment by the SASAC, the State-owned  
7 Assets Supervision Administration Commission of the State  
8 Council.

9 MS. FU: I would like to make a correction to the  
10 last sentence. "This is a requirement by the SASAC." Not  
11 an amendment. It is a requirement.

12 INTERPRETER: Thank you.

13 BY MR. BENZ:

14 Q. Okay.

15 (Exhibit 8416 marked for identification)

16 Q. Mr. Wang, I've handed you the exhibit that's  
17 been marked 8416. It was produced by Irigo in this  
18 litigation with Bates numbers IRI-CRT-00001026 through 27.

19 We have the original Chinese document as well as  
20 a certified English translation on top.

21 Please take as long as you would like to review  
22 this document.

23 A. I have reviewed it.

24 Q. What is this document?

25 A. This is an articles of association for Irigo

1 3.25 billion yuan."

2 Do you see that?

3 A. Yes.

4 Q. As Irico Display's corporate designee for  
5 topic 1, is that a correct description of Irico display's  
6 main business goal for 2008 as it was written in 2007?

7 A. The question is not very clear.

8 MS. FU: I would like the interpreter to try that  
9 one more time.

10 MR. JACOBSMEYER: I also object to the form of the  
11 question.

12 MR. BENZ: What is the basis for your objection?

13 MR. JACOBSMEYER: Mischaracterizes when the  
14 document was written.

15 A. Would you mind repeating your question.

16 BY MR. BENZ:

17 Q. Before I do, Mr. Wang, can you turn back to  
18 page 89.

19 Do you see on that page the date, April 23rd,  
20 2008?

21 A. Yes, I saw it.

22 Q. And the signature shows this report was issued  
23 by Irico Display Component Co Ltd board of directors? Do  
24 you see that?

25 A. Yes.

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1 Q. This report appears to have been signed by  
2 chairman of the board of directors Xing Daoqin, do you see  
3 that?

4 A. Yes.

5 Q. Please turn back to page 19.

6 A. Yes. Go ahead.

7 Q. You see this sentence under business plan for  
8 the new year:

9 "The company's main business goals for 2008:  
10 Color tube sales of 15,380,000 and sales revenue of  
11 3.25 billion yuan."

12 A. Yes, I saw it.

13 Q. As Irico Display's corporate designee for  
14 topic 1, is that a correct description of Irico Display's  
15 main business goals for 2008 as reported by the board of  
16 directors on April 23, 2008?

17 A. (Chinese spoken) --

18 MS. FU: I would like the interpreter to try that  
19 one more time. (Chinese spoken) --

20 INTERPRETER: (Chinese spoken).

21 A. (Chinese spoken) (Indicates).

22 MS. FU: Go ahead.

23 A. What has been written is how it is. Because  
24 it is written as the business plan for the New Year 2008.

25 MR. BENZ: Thank you Mr. Wang, I'm going to turn

1 Shenyang for a while, then I was transferred to Shenzhen for  
2 a while before I was relocated back to Shenyang.

3 Q. That was not my question, Mr. Wang.

4 What I was trying to get at is what were your job  
5 responsibilities. Not what your job history is.

6 A. When I started to join the company, I work as  
7 a sales rep, and I do mainly do sales work. I remember  
8 I also covered the territory in north east area of China.  
9 There is a TV factory called Chiamu Shih --

10 INTERPRETER: C-H-I-A-M-U S-H-I-H.

11 A. So I was sales rep, and to sell the color  
12 tubes. Then I was transferred to advertisement company.  
13 That responsibility probably is not relevant to this  
14 litigation case. Then I went to the Beijing office, or  
15 branch office in Beijing. Also served as a sales rep. My  
16 customer is Beijing TV factory, the brand name is called  
17 Mudan.

18 Then I was relocated back to Shenyang. By that  
19 time I went to Shenzhen, I work in one of the offices there,  
20 and at that time Mr. Kao Wei was my colleague at Shenzhen.  
21 At Shenzhen office my main responsibility is for TCL. And  
22 cover some of the customers in Guangdong province. Later on  
23 I took the responsibility as the director in the department,  
24 then I kind of doing administrative or management work.  
25 Also covers certain sales work. For a while I was also



1 responsible for the sales of TCL. These are the background  
2 that I can recollect.

3 So then I was transferred to the marketing, and  
4 then supervised the entire sales team. Then for a while  
5 I was not responsible for the sales issues. I kind of in  
6 charge of the aftersales service. That's so much about it.

7 Q. Thank you, Mr. Guo (sic), you have given me  
8 a lot to work with.

9 A. I try my best.

10 Q. I appreciate it, thank you.

11 A. (Chinese spoken).

12 Q. So you mentioned several specific customers  
13 there. One of them was Chia -- I don't, I'm trying to read  
14 off the -- the first customer was Chiamu Shih. The second  
15 customer was Beijing TV factory Mudan, is that correct?

16 Did I state that accurately?

17 A. Yes, that's correct.

18 Q. And then when you moved to Shenzhen, you were  
19 responsible for customer TCL, is that correct?

20 A. Yes, for a certain period. It is just for  
21 a certain period.

22 Q. Do you remember generally what time period  
23 that was?

24 A. I don't quite remember. In the beginning  
25 I was in charge of TCL. By the time I was transferred to